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May 4, 2015

## VIA HAND DELIVERY

Honorable Stuart M. Bernstein United States Bankruptcy Court Southern District of New York One Bowling Green, Courtroom 723 New York, NY 10004-1408

Re: Discovery Conference Request; In re OAS S.A., et al., Case No. 15-10937 (SMB)

## Dear Judge Bernstein:

We are counsel to Aurelius Capital Management, LP on behalf of entities it manages, including Aurelius Investment, LLC and Huxley Capital Corporation (collectively, "Aurelius") and Alden Global Capital LLC on behalf of entities it manages, including Alden Global Adfero BPI Fund, Ltd., Alden Global Opportunities Master Fund, L.P., Alden Global Value Recovery Master Fund, L.P., and Turnpike Limited (collectively, "Alden"), as holders or managers of entities that hold beneficial interests in certain notes issued and/or guaranteed by OAS S.A. and certain of its subsidiaries ("OAS").

We write pursuant to Local Rule 7007-1 to request until May 7, 2015 at 9am to substantively respond to the letter of OAS's litigation counsel, Quinn Emanuel, dated today. We have sought the agreement of Quinn Emanuel to this brief response period and they have declined, saying that they would not agree to a response period after May 6 at 6pm.

I am traveling on business at the moment but we are available for the Local Rule 7007-1(b) conference in the afternoon of May 7<sup>th</sup>, the afternoon of May 8<sup>th</sup>, or as directed by the Court.

Sincerely,

Allan S. Brilliant

ASM